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AT ABINGDON, VA  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA  
ABINGDON DIVISION

UNITED STATES OF AMERICA :

v. :

Case No. 1:21CRB1

Violation: 18 U.S.C. §§ 1028A,  
1343, and 1349

JESSEE ALLEN DELOACH :

NATASHA ASHLEY MILLER DELOACH :

INDICTMENT

The Grand Jury charges that:

INTRODUCTION

BACKGROUND

1. On or about and between March 1, 2016, and November 30, 2019, JESSEE ALLEN DELOACH and NATASHA ASHLEY MILLER DELOACH were residents of Virginia.

2. During the relevant period, JESSEE ALLEN DELOACH and NATASHA ASHLEY MILLER DELOACH owned and operated Koltown Properties, Inc. ("Koltown Properties"), a real estate agency operating in two locations within the Western District of Virginia, including locations in Wise, Virginia, and Abingdon, Virginia.

3. Advance My Commission, L.L.C. is a commission advance company with a corporate office in Arizona.

4. Advanced Commission is a commission advance company with a corporate office in Nevada.

5. CommisisonAlly, L.L.C. is a commission advance company with a corporate office in Texas.

6. Commission Express is a commission advance company with a corporate office in Virginia and store locations throughout the United States.

7. Commission Front L.L.C. is a commission advance company with a corporate office in Montana.

8. Clover Capital Financing is a commission advance company with a corporate office in Texas.

9. eCommission Financial Services, Inc. is a commission advance company with a corporate office in Texas.

10. Express Cash Flow, L.L.C. is a commission advance company with a corporate office in California.

11. Husker Commission Advance is a commission advance company with a corporate office in Nebraska.

12. Each of the commission advance companies listed in the Indictment provides a financial service to real estate agents and brokers by assisting them with cash flow. Specifically, real estate agents and brokers sell portions of their pending commissions on residential sales contracts to the commission advance companies, and, in exchange, the agents and brokers can access cash from their commissions before closing.

### THE SCHEME

13. During the relevant period of March 1, 2016, through November 30, 2019, JESSEE ALLEN DELOACH and NATASHA ASHLEY MILLER DELOACH created

fraudulent residential sales contracts (“fraudulent contracts”) and submitted the fraudulent contracts to the commission advance companies to obtain advance commissions to which they were not entitled.

14. The fraudulent contracts were sent to the commission advance companies by JESSEE ALLEN DELOACH and NATASHA ASHLEY MILLER DELOACH via electronic mail.

15. In some instances, JESSEE ALLEN DELOACH and NATASHA ASHLEY MILLER DELOACH submitted fraudulent contracts for properties they knew were not under contract or that listed purchasers and/or sellers who did not exist.

16. In other instances, JESSEE ALLEN DELOACH and NATASHA ASHLEY MILLER DELOACH altered valid residential sales contracts to reflect that no other real estate agent was involved in the transaction to double the claimed commission and thus increase the value of the commission advances they received.

17. As part of their scheme to defraud the commission advance companies, JESSEE ALLEN DELOACH and NATASHA ASHLEY MILLER DELOACH knowingly used, without lawful authority, means of identification of other persons—specifically other persons’ names and signatures—by electronically signing fraudulent contracts without the other persons’ knowledge.

18. Further, as part of their scheme to defraud the commission advance companies, JESSEE ALLEN DELOACH and NATASHA ASHLEY MILLER DELOACH created fake title companies, including Excel Title Company, to validate fraudulent contracts when the commission advance companies conducted due diligence regarding the requested advances.

JESSEE ALLEN DELOACH and NATASHA ASHLEY MILLER DELOACH utilized the email address melissa@exceltitleco.com to communicate with the commission advance companies as a fictitious representative of Excel Title Company named “Melissa Bevins.” NATASHA ASHLEY MILLER DELOACH also answered the telephone for Excel Title Company as “Melissa Bevins.”

### **THE SCOPE OF THE SCHEME**

19. From March 1, 2016 through November 30, 2019, JESSEE ALLEN DELOACH and NATASHA ASHLEY MILLER DELOACH received more than \$150,000 in fraudulently obtained commission advances from the nine commission advance companies listed in the Introduction.

20. During the relevant period, JESSEE ALLEN DELOACH and NATASHA ASHLEY MILLER DELOACH submitted fraudulent contracts for at least nineteen properties. Many of the same fraudulent contracts were submitted to multiple commission advance companies.

21. Below are two examples of how the scheme was implemented.

### **THE SPRINGVIEW RIDGE PROPERTY**

23. In February 2019, JESSEE ALLEN DELOACH and NATASHA ASHLEY MILLER DELOACH utilized the identities of W.H. and R.H. to create a fraudulent contract for property located on Springview Ridge in Bristol, Virginia (the “Springview Ridge property”).

24. The fraudulent contract listed W.H. and R.H. as the sellers of the Springview Ridge property and contained W.H.'s and R.H.'s purported electronic signatures. Neither W.H. nor R.H. had knowledge of or signed the fraudulent contract.

25. The fraudulent contract for the Springview Ridge property listed JESSEE ALLEN DELOACH as both the selling and listing agent and \$610,000 as the purchase price for the property.

26. On February 15, 2019, the fraudulent contract for the Springview Ridge property was submitted by JESSEE ALLEN DELOACH to CommissionAlly, L.L.C. via electronic mail from Virginia to Texas.

27. On February 15, 2019, JESSEE ALLEN DELOACH executed a written contract with CommissionAlly, L.L.C., pursuant to which JESSEE ALLEN DELOACH agreed to pay a fee of \$1,560 to secure a commission advance of \$13,000 in relation to the fraudulent contract for the Springview Ridge property.

28. C.I., a representative of CommissionAlly, L.L.C. located in Texas, emailed JESSEE ALLEN DELOACH in Virginia and asked for contact information for the title company handling the purported closing of the Springview Ridge property. JESSEE ALLEN DELOACH emailed C.I. the telephone number for Excel Title Company and provided the email address melissa@exceltitlco.com for the fictitious contact "Melissa Bevins."

29. On February 19, 2019, CommissionAlly, L.L.C. wired JESSEE ALLEN DELOACH the \$13,000 commission advance.

#### **THE BLUE SPRUCE DRIVE PROPERTY**

30. In March 2016, JESSEE ALLEN DELOACH and NATASHA ASHLEY MILLER DELOACH utilized the identity of B.N. to create a fraudulent contract for property located on Blue Spruce Drive in Wise, Virginia (the "Blue Spruce Drive property").

31. The fraudulent contract listed B.N. as the purchaser of the Blue Spruce Drive property and contained B.N.'s purported electronic signature. B.N. had no knowledge of the fraudulent contract.

32. The fraudulent contract listed NATASHA ASHLEY MILLER DELOACH as both the selling and listing agent and \$197,000 as the purchase price for the property.

33. The fraudulent contract for the Blue Spruce Road property was submitted by NATASHA ASHLEY MILLER DELOACH to Express Cash Flow, L.L.C. via electronic mail from Virginia to California.

34. On March 29, 2016, NATASHA ASHLEY MILLER DELOACH executed a written contract with Express Cash Flow, L.L.C., pursuant to which NATASHA ASHLEY MILLER DELOACH agreed to pay a fee of \$1,400 to secure a commission advance of \$7,600 in relation to the fraudulent contract for the Blue Spruce Road property.

35. On March 30, 2016, and March 31, 2016, Express Cash Flow, L.L.C. wired commission advances of \$2,500 and \$5,100, respectively, to NATASHA ASHLEY MILLER DELOACH and JESSEE ALLEN DELOACH.

### **COUNT ONE**

The Grand Jury charges that:

1. The Introduction is realleged and incorporated by reference.

2. On or about and between March 1, 2016, and November 30, 2019, in the Western District of Virginia and elsewhere, JESSEE ALLEN DELOACH and NATASHA ASHLEY MILLER DELOACH, as principals and aiders and abettors, devised and intended to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.

3. It was part of the scheme that JESSEE ALLEN DELOACH and NATASHA ASHLEY MILLER DELOACH used false identifications, created fake title companies, and created and altered residential sales contracts to fraudulently obtain commission advances, as set forth in the introduction.

4. For the purpose of executing such scheme and artifice and attempting to do so, JESSEE ALLEN DELOACH and NATASHA ASHLEY MILLER DELOACH transmitted and caused to be transmitted by means of wire communication in interstate commerce writings, signs, signals, and sounds, including, but not limited to, fraudulent residential sales contracts.

5. All in violation of Title 18, United States Code, Sections 2 and 1343.

### **COUNTS TWO AND THREE**

The Grand Jury charges that:

1. The information in the Introduction is realleged and incorporated by reference.

2. On or about the dates set forth below, in the Western District of Virginia and elsewhere, JESSEE ALLEN DELOACH and NATASHA ASHLEY MILLER DELOACH, as principals and aiders and abettors, knowingly used and caused to be used, without lawful

authority, a means of identification of another person, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: 18 U.S.C. § 1343, knowing that the means of identification belonged to another actual person.

<u>Count</u>	<u>Date</u>	<u>Initials Of Person</u>
Two	February 2019	W.H.
Three	February 2019	R.H.

3. All in violation of Title 18, United States Code, Sections 2 and 1028A.

#### **COUNT FOUR**


The Grand Jury charges that:

1. The Introduction is realleged and incorporated by reference.
2. On or about and between March 1, 2016, and November 30, 2019, in the Western District of Virginia and elsewhere, JESSEE ALLEN DELOACH and NATASHA ASHLEY MILLER DELOACH conspired to devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises and for the purpose executing such scheme and artifice and attempting to do so, transmit and cause to be transmitted by means of wire communication in interstate commerce writings, signs, signals, and sounds, including, but not limited to, fraudulent residential sales contracts, in violation of Title 18, United States Code, Section 1343.

3. All in violation of Title 18, United States Code, Section 1349.

A true bill this 25<sup>th</sup> day of October, 2021.

  
Christopher R. Kavanaugh

by  Christopher R. Kavanaugh  
United States Attorney

/s/ Grand Jury Foreperson